

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 24-3345-PET

Limited Size and Scope Application)
of Bell Atlantic Mobile Systems, LLC)
d/b/a Verizon Wireless and Vertex Towers, LLC,)
for a Certificate of Public Good,)
pursuant to 30 V.S.A. § 248a, authorizing the construction)
of a telecommunications facility in Manchester, Vermont)

**DECLARATION OF BRENDAN M. GILL IN SUPPORT OF PETITIONER’S MOTION
FOR SUMMARY JUDGMENT**

NOW COMES, Brendan M. Gill, who states as follows:

1. My name is Brendan M. Gill, I work for Vertex Towers, LLC Director of Site Acquisition and Leasing, with a focus on wireless facility site acquisition.
2. On behalf of the Petitioner, I evaluated potential sites for wireless telecommunication facilities in and around Manchester, Vermont.
3. Verizon undertook a detailed review of existing telecommunications facilities within a 10-mile radius of the site, as discussed further in the Declaration of Tim Parks in Support of Motion for Summary Judgement. *See also* the Prefiled Testimony of Martin Lavin and Exhibit ML-3.
4. Following the determination that there were no facilities available for co-location that would allow the Petitioner to meet its coverage objectives, I evaluated many other properties in the area under a general framework based on 1) whether the site could provide coverage to meet the coverage goals of Petitioner, 2) whether a tower could feasibly and reasonably be constructed on the site or where there environmental and spatial limitations about the site that made construction unreasonable, and 3) whether the site and/or landowner was available to Petitioner.


5. The potential sites considered and the basis for their rejection are shown on Exhibit BG-1 – Alternative Site Review filed herewith.
6. All of these other properties were deemed unworkable for one or more of the following reasons: 1. it didn't meet the coverage objective; 2. because there were substantive title issues, wetlands or other conservation easements and/or environmental limitations (i.e ANR Habitat Blocks or wetlands) that would prevent or prohibit development of a tower on the property; 3. because a tower on the property would be substantially more visible because of existing clearing on the property or surrounding properties; 4. and/or because the landowner was not responsive or not interested in leasing the property for a tower.
7. On behalf of the Petitioner, I specifically investigated whether we could locate the site on the gravel pit to the north of the proposed site. Petitioner investigated locating a tower on this property but was unable to secure any lease for the property on commercially reasonable terms and which addressed Petitioner's serious concerns about locating sensitive telecommunications equipment in area of active quarrying and heavy machinery. Moreover, even if Petitioner were able to secure a lease for this property, any tower on this property would be substantially closer to other sensitive uses (such as the Red Fox Community School) and substantially more visible because of existing clearing on the property and surrounding properties.
8. While on site investigating the proposed site and potential alternative sites, I also reviewed the area for any existing tall structures which could support a proposed telecommunications facility. I did not locate any existing structures within the area to be served by this project with the height or structural integrity which would support co-location.

9. Therefore, after this exhaustive review, the only property that was available, suitable from an environmental standpoint, and with an owner willing to lease to Petitioner on a commercially viable basis, was the property proposed to be used by Petitioner located at 410 Hunter Park Road, Manchester.

Brendan M. Gill hereby states as follows pursuant to Commission Rule 2.213(C)(5):

1. The information in my Declaration and all exhibits sponsored therein are true and accurate to the best of my personal knowledge and belief.
2. I have personal knowledge of and am able to testify as to the validity of the information contained in my Declaration and all exhibits sponsored therein.
3. I understand I will be subject to sanctions for contempt and perjury if any statements are false.

Dated: 12/15/2025

Signed by:

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Brendan M. Gill

Exhibits to Declaration of Brendan M. Gill

Exhibit BG-1

Alternative Site Review